

ORIGINAL

SOUTH COAST AQMD  
CLERK OF THE BOARD

PETITION FOR VARIANCE  
BEFORE THE HEARING BOARD OF THE  
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

SV  
1/26/22

21 DEC 21 10:25

PETITIONER: Lunday-Thagard Company dba World Oil Refining

CASE NO: 2033-34

FACILITY ID: 800080

FACILITY ADDRESS: 9302 Garfield Avenue

*[location of equipment/site of violation; specify business/corporate address, if different, under Item 2, below]*

City, State, Zip: South Gate, CA 90280

1. TYPE OF VARIANCE REQUESTED (more than one box may be checked; see Attachment A, Item 1, before selecting)

☐ INTERIM ☒ SHORT ☐ REGULAR ☐ EMERGENCY ☐ EX PARTE EMERGENCY

2. CONTACT: Name, title, company (if different than Petitioner), address, and phone number of persons authorized to receive notices regarding this Petition (no more than two authorized persons).

David Chetkowski

Aron Potash

Environmental Manager, World Oil

Latham & Watkins LLP

9302 Garfield Avenue

355 South Grand Avenue

South Gate, CA Zip 90280

Los Angeles, CA Zip 90071-1560

☎ ( 562 ) 928-7000 Ext. 2329

☎ ( 213 ) 891-8758 Ext.

E-mail dchetkowski@worldoilcorp.com

E-mail aron.potash@lw.com

3. RECLAIM Permit ☒ Yes ☐ No Title V Permit ☒ Yes ☐ No

4. **GOOD CAUSE:** Explain why your petition was not filed in sufficient time to issue the required public notice. (Required only for Emergency and Interim Variances; see Attachment A, Item 4)

N/A

*Persons with disabilities may request this document in an alternative format by contacting the Clerk of the Board at 909-396-2500 or by e-mail at [clerkofboard@aqmd.gov](mailto:clerkofboard@aqmd.gov).*

*If you require disability-related accommodations to facilitate participating in the hearing, contact the Clerk of the Board at least five (5) calendar days prior to the hearing.*

**[ALL DOCUMENTS FILED WITH CLERK'S OFFICE BECOME PUBLIC RECORD]**



5. Briefly describe the type of business and processes at your facility.

World Oil Refining's ("World Oil") facility is a petroleum refinery that processes crude oil into asphalt. Non-asphalt byproducts (naphtha, light distillate oil, and vacuum gas oils) are shipped to other companies (including motor fuel refineries) for further processing.

World Oil petitions the Hearing Board for this variance because World Oil needs to shut down a vapor incinerator (C97) for an approximately two day period in order to both (1) conduct maintenance on and internal inspections of C97 and (2) allow SoCalGas to perform maintenance on the natural gas line supplying the facility.

When the natural gas line and incinerator C97 are undergoing maintenance, World Oil will not be able to operate the incinerator. The incinerator is the permitted control device for storage tanks, refining operations (crude distillation and treating/stripping units), asphalt blowing operations, asphalt loading operations, and wastewater system components.

World Oil requests a variance allowing it to vent the storage tanks, wastewater system components, and asphalt loading operations to alternative control devices (with control efficiency equivalent to incinerator C97) while the natural gas line and incinerator maintenance and inspection work is being performed.

The asphalt blowing and refining operations will be shut down several days before the incinerator is shut down so that the refinery can conduct a planned turnaround.

Given the limited duration and straightforward nature of the variance request, and given the absence of excess emissions, World Oil proposes that this matter be heard on the consent calendar, and World Oil's counsel will reach out to District counsel to discuss this request.

6. List the equipment and/or activity(s) that are the subject of this petition (see Attachment A, Item 6, Example #1). **Attach copies of the Permit(s) to Construct and/or Permit(s) to Operate for the subject equipment. For RECLAIM or Title V facilities, attach only the relevant sections of the Facility Permit showing the equipment or process and conditions that are subject to this petition. You must bring the entire Facility Permit to the hearing.**

Equipment/Activity	Application/ Permit No.	RECLAIM Device No.	Date Application /Plan Denied (if relevant)*
<b>Storage Tanks:</b>			
Storage Tank 413, Fixed Roof, LVGO, 20,000 gals	556994	D38	
Storage Tank 414, Fixed Roof, LVGO, 20,000 gals	564027	D39	
Storage Tank 415, Fixed Roof, LVGO, 20,000 gals	556992	D40	
Storage Tank 418, Fixed Roof, LVGO, Naphtha, Gas Oil, Light Distillate Oil, 20,305 gals	603730	D286	
Storage Tank 419, Fixed Roof, Naphtha, Gas Oil, 20,106 gals	493999	D47	
Storage Tank 420, Fixed Roof, Naphtha, Gas Oil, 20,106 gals	426413	D48	
Storage Tank 421, Fixed Roof, Naphtha, Gas Oil, 20,106 gals	494000	D49	
Storage Tank 422, Fixed Roof, Naphtha, Gas Oil, Kerosene, 20,106 gals	494001	D50	
Storage Tank 423, Fixed Roof, Naphtha, Gas Oil, Light Distillate Oil, 20,305 gals	597148	D284	
Storage Tank 3503, Fixed Roof, Slop Oil, Waste Water, 3700 bbls	539681	D252	
Storage Tank 3504, Fixed Roof, Slop Oil, Waste Water, 4029 bbls	588765	D270	
Storage Tank 4208, Fixed Roof, LVGO, 4200 bbls	556995	D71	



Storage Tank 8705, Fixed Roof, Crude, 8700 bbls	498827	D35	
Storage Tank 10001, Fixed Roof, Crude, 10,307 bbls	540826	D251	
Storage Tank 10002, Fixed Roof, Crude, 10,307 bbls	585587	D269	
<b>Wastewater Components:</b>			
Oil Water Separator, Fixed Roof, 72,000 gpd	622795	D222	
Air Flotation Unit, DAF, Circular	622795	D237	
<b>Storage Tank Line H2S Scrubbers:</b>			
Scrubber, Packed Bed, V-510, 6000 lbs	622796	C239	
Scrubber, Packed Bed, V-511, 6000 lbs	622796	C240	
<b>Asphalt Loading Operations:</b>			
Loading Arm, Asphalt, 2 Total	403055	D29	
Loading Arm, Asphalt, 4 Total	403057	D25	
<b>Incinerator C97:</b>			
Incinerator, I-301, Natural Gas, Process Gas, 14 MMBTU/HR	612433	C97	

\*Attach copy of denial letter

7. Briefly describe the activity or equipment, and why it is necessary to the operation of your business. A schematic or diagram may be attached, in addition to the descriptive text.

World Oil is planning a refinery turnaround in late February 2022 and plans to shut down its vapor incinerator (C97) on or about February 25, 2022. The purpose of this C97 shutdown is to perform maintenance and internal inspections of C97, and also to allow SoCalGas to perform maintenance on their natural gas line supplying the facility. The incinerator cannot be operated during the maintenance and inspections, and without natural gas.

C97 currently serves as the primary vapor recovery/control system for the facility and receives emissions from fifteen storage tanks, the wastewater treatment system, asphalt blowing operations, asphalt truck loading operations, and refining operations.

World Oil petitions for variance coverage for the time C97 is offline as, during this time, it will not be able to vent to C97 emissions which may occur from the tanks, wastewater system components, and asphalt blowing operations. World Oil would like the variance to permit it to vent this equipment to portable air pollution control devices with a control efficiency equivalent to C97's (a storage tank and vacuum truck degassing system, which is the same system World Oil has used in the past when C97 has been out of service).

There will be no asphalt blowing or refinery operations during the time C97 is offline. Refinery and asphalt blowing operations will have been shut down for a planned turnaround several days prior to the planned shutdown of C97.

#### Tank Breathing Losses

When C97 is offline, the tanks connected to C97 will experience emissions that would, if no alternative control measures are taken, escape to the atmosphere. These tanks include: D35, D38, D39, D40, D47, D48, D49, D50, D71, D251, D252, D239, D270, D284, and D286, which are used to store naphtha, crude, gas oil, waste water, and slop oil (the "Storage Tanks"). Accordingly, World Oil proposes to vent the Storage Tanks to an alternative control device during the variance period, such that there will no excess emissions.

Vapors collected from the Storage Tanks (and wastewater treatment system) pass through H2S scrubbers C239 and C240 (the "Storage Tank Line H2S Scrubbers") and are continuously monitored for H2S concentration. A portable, temporary control device will be located downstream of the Storage Tank Line H2S scrubbers and continuous monitor; therefore, vapors collected from the Storage Tanks and wastewater treatment system will be continuously monitored and controlled for H2S by existing, permitted systems



throughout the variance period.

World Oil includes the Storage Tank Line H2S Scrubbers in this variance request only because the facility's permit requires that this equipment be vented to incinerator C97, but World Oil will be unable to vent the Storage Tank Line H2S Scrubbers to C97 during the variance period when C97 cannot be operated. World Oil therefore requests that the variance permit it to vent these scrubbers to an alternative control device.

#### Wastewater System Emissions

The vapor collection system for the wastewater system components D222 (an API separator) and D237 (a dissolved air flotation unit) (together, the "Wastewater Components"), is vented to incinerator C97, via the storage tank vent vapor collection line, pursuant to the facility's permit. As a result, all vapors collected from the Wastewater Components will be controlled by the proposed portable control device that will also serve the Storage Tanks.

#### Asphalt Loading Operations

World Oil vents emissions from the loading of asphalt into tank trucks for offsite shipment using loading racks D25 and D29 (the "Asphalt Loading Operations"). Asphalt is one of the primary products World Oil produces. As SoCalGas asked to schedule the natural gas line work during a period when World Oil will be faced with customer orders for asphalt to support infrastructure projects, World Oil requests that the variance permit it to continue the Asphalt Loading Operations and vent vapors collected from the Asphalt Loading Operations to a portable, temporary control device with a control efficiency equivalent to C97's.

World Oil proposes that this petition for a variance be heard on the consent calendar, and World Oil's counsel will reach out to District counsel to discuss this request.

8. Is there a regular maintenance and/or inspection schedule for this equipment? Yes ☒ No ☐

If yes, how often: Bimonthly and daily Date of last maintenance and/or inspection current date

Describe the maintenance and/or inspection that was performed.

Daily visual inspections for any VOC leaks are performed by the operators and bimonthly Rule 1173 inspections for valves, fittings, pumps, compressor and pressure relief devices are performed on a regular basis by our third party inspectors.

9. List all District rules, and/or permit conditions [indicating the specific section(s) and subsection(s)] from which you are seeking variance relief (if requesting variance from Rule 401 or permit condition, see Attachment A). Briefly explain how you are or will be in violation of each rule or condition (see Attachment A, Item 9, Example #2).

Rule	Explanation
Rule 203(b) Rule 2004(f)(1) Rule 3002(c)(1)  "Connected to" portion of Section D of Facility Permit	<p>Rules 203(b), 2004(f)(1), and 3002(c)(1) require World Oil to operate all devices and equipment pursuant to the conditions specified in its facility permit. Specifically, Rule 203(b) requires that equipment not be operated contrary to the conditions specified in a permit to operate. Rule 2004(f)(1) requires a facility permit holder to comply with all rules and permit conditions applicable to a facility. Rules 3002(c)(1) requires the operation of a Title V facility and all equipment located at a Title V facility in compliance with all terms, requirements, and conditions specified in the Title V permit at all times.</p> <p>World Oil's permit requires that it vent the Storage Tanks and Wastewater Components to C97 via the Storage Tank Line H2S Scrubbers and that it vent the Asphalt Loading Racks directly to C97. (See the "Connected To" column on pages 1-17 of Section D and on pages 1-4 of Section H). Since C97 will not be in operation while the maintenance and inspection work is performed and the natural gas curtailment is in effect, World Oil will not be able to comply with these permit requirements.</p>



10. Are the equipment or activities subject to this request currently under variance coverage? Yes ☐ No ☒

Case No.	Date of Action	Final Compliance Date	Explanation

11. Are any other equipment or activities at this location currently (or within the last six months) under variance coverage? Yes ☐ No ☐

Case No.	Date of Action	Final Compliance Date	Explanation
2033-33	Variance granted July 15, 2021	August 21, 2021	The Hearing Board granted a variance allowing the facility to shut down to repair equipment. There were no excess emissions.

12. Were you issued any Notice(s) of Violation or Notice(s) to Comply concerning this equipment or activity within the past year? Yes ☒ No ☐

NOVs, P65098 and P74062, which relate to self-reported deviations on Title V semiannual monitoring reports, are attached.

If yes, you must attach a copy of each notice.

13. Have you received any complaints from the public regarding the operation of the subject equipment or activity within the last six months? Yes ☐ No ☒

If yes, you should be prepared to present details at the hearing.

14. Explain why it is beyond your reasonable control to comply with the rule(s) and/or permit condition(s). Provide specific event(s) and date(s) of occurrence(s), if applicable.

In order to conduct maintenance and inspections on C97, and allow SoCalGas to perform maintenance work on the natural gas line supplying the facility, incinerator C97 (which requires natural gas to operate) must be shut down for a brief period. Incinerator C97 serves as a vapor recovery control device for World Oil's Storage Tanks, Wastewater Components, and Asphalt Loading Racks, but C97 will not be able to control the emissions from these devices when C97 is shut down. Absent a variance, there would be a period of noncompliance with SCAQMD rules and World Oil's current facility permit during the shutdown, as the permit requires that the devices connected to C97 be vented to it, and District rules require compliance with permit requirements.

World Oil has assessed options to avoid noncompliance while performing the needed work, and there are no options within World Oil's reasonable control.

The Storage Tanks need to "breathe" during the C97 shutdown period, so unless the tanks are completely removed from service, the potential breathing losses will need to be vented. To completely remove the tanks from service, the tanks would have to be drained, degassed and cleaned pursuant to SCAQMD Rule 1149



and other regulatory requirements. This process would take several weeks to accomplish, cost in excess of \$250,000 (project costs only), and would generate far greater emissions than leaving the tanks in operation during the C97 shutdown period. In addition, extensive economic and operational hardships would be realized by World Oil, employees, contractors, and crude oil suppliers as a result of these tanks being taken out of service for an extended period of time. For these reasons, completely removing the Storage Tanks from service would be beyond World Oil's reasonable control.

The Wastewater Components will need to continue to treat process water and rainwater that collects at the facility during the period of the variance.

With respect to the Asphalt Loading Operations, absent the variance, World Oil would also be forced to shut down operation during the variance period, despite the fact that continued operation of these units would result in no excess emissions (given that World Oil proposes to vent them to an alternative vapor control system during the variance period). SoCalGas informed World Oil that it must perform the maintenance work on the natural gas line supplying the facility on a weekday, when World Oil will face commitments to customers to provide asphalt. Shutting down the Asphalt Loading Operations would force World Oil to incur significant economic losses, as it would be unable to meet customer commitments during the variance period (absent receipt of a variance), resulting in large financial losses to World Oil and interrupting the flow of asphalt to critical infrastructure projects.

World Oil will install an alternative vapor control system for the shutdown period. World Oil will ensure that the supplier of the alternative vapor control system has a various locations permit for the system. However, World Oil still requires a variance to vent the Storage Tanks, Wastewater Components, and Asphalt Loading Operations to a control device other than the control device specified in its permit, incinerator C97.

15. When and how did you first become aware that you would not be in compliance with the rule(s) and/or permit condition(s)? Provide specific event(s) and date(s) of occurrence(s).

World Oil was informed by SoCalGas in early 2021 that it would need to perform maintenance on the natural gas line supplying World Oil's facility at a mutually agreed upon time that would minimize disruption to World Oil operations. World Oil agreed to allow SoCalGas to curtail natural gas supply to the facility during a planned turnaround during which World Oil is planning to perform maintenance and inspections on C97.

16. List date(s) and action(s) you have taken since that time to achieve compliance.

The following actions have been taken to achieve compliance:

1. Formulated plan for natural gas line work to be performed without any excess emissions.
2. Researched temporary control alternatives for use during work.
3. Prepared short variance petition.

17. What would be the harm to your business during **and/or after** the period of the variance if the variance were not granted?

Economic losses: please see explanation below

Number of employees laid off (if any): undetermined

Provide detailed information regarding economic losses, if any, (anticipated business closure, breach of contracts, hardship on customers, layoffs, and/or similar impacts).



If the variance is not granted, World Oil would have to eliminate the VOC breathing loss emissions from the Storage Tanks by removing them from active service, cease use of the Wastewater Components, and cease all operation of the Asphalt Loading Racks.

As stated previously in response to Question 14, in order to remove the tanks from active service, the tanks would have to be drained, degassed and cleaned pursuant to SCAQMD Rule 1149 and other regulatory requirements. This process would take several weeks to accomplish, cost in excess of \$250,000 (project costs only), and would generate far greater emissions than leaving the tanks in operation (idle) during the shutdown period.

If World Oil were forced to cease use of the Asphalt Loading Operations, it estimates it could face \$350,000 per day in economic losses.

In addition, World Oil would have to deny SoCalGas's request to perform maintenance on their natural gas line that supplies the facility.

18. Can you curtail or terminate operations in lieu of, or in addition to, obtaining a variance? Please explain.

When incinerator C97 is offline, World Oil will have already stopped the bulk of its operations because the refinery will be in the middle of a turnaround. Specifically, World Oil will have already ceased all refining operations, including its asphalt blowing operations. There will be no emissions from these units.

VOC breathing loss emissions will be generated from the Storage Tanks and Wastewater Components. As identified in response to Question 14 above, the only way to completely eliminate the VOC breathing losses from these tanks would be to remove them from active service. Removing the tanks from active service would result in additional VOC emissions, excessive costs, and hardships to World Oil, its employees, contractors, and suppliers. The Wastewater Components, as well as wastewater tank D52, will be operated during the shutdown of C97.

As an alternative to removing the tanks from active service, World Oil is proposing to vent the breathing loss emissions to an alternative control device with a District various locations permit and a VOC destruction control efficiency of 99% or greater, equivalent to that of Incinerator I-301 (C97). The alternative control device will likely be a storage tank and vacuum truck degassing system (the same alternative control device World Oil used when it last shut down C97). As the alternative control device will have a VOC destruction efficiency equivalent to that of the permitted incinerator, use of the alternative control device should result in no excess emissions during the shutdown.

World Oil is proposing to vent the Asphalt Loading Operations to a similar alternative control device with a District various locations permit and a VOC destruction control efficiency of 99% or greater, equivalent to that of Incinerator I-301 (C97).

19. Estimate excess emissions, if any, on a daily basis, including, if applicable, excess opacity (the percentage of total opacity above 20% during the variance period). If the variance will result in no excess emissions, insert "N/A" here and skip to No. 20.

Pollutant	(A)	(B)	(C)*
	Total Estimated Excess Emissions (lbs/day)	Reduction Due to Mitigation (lbs/day)	Net Emissions After Mitigation (lbs/day)
N/A			

\* Column A minus Column B = Column C

Excess Opacity: \_\_\_\_\_ %



20. Show calculations used to estimate quantities in No. 19, or explain why there will be no excess emissions.

There will be no excess emissions during the shutdown since the VOC emissions from the Storage Tanks, Wastewater Components, and Asphalt Loading Operations will be controlled using alternative control devices with VOC destruction efficiency equivalent to that of the permitted incinerator.

For informational purposes, below is a summary of the controlled and uncontrolled VOC emissions related to the Storage Tanks, Wastewater Components, and Asphalt Loading. Uncontrolled VOC emissions are calculated by taking the hourly emission rate from the VOC Destruction Efficiency Test on December 20, 2020, and applying it to a 24 hour period. It should be noted that the estimates below are representative of normal operations and actual uncontrolled/unmitigated emissions are anticipated to be much less since refinery operations will be down for turnaround.

Uncontrolled/Unmitigated VOC Emissions

Daily Emissions (uncontrolled) = 569.3 lbs/day

Controlled/Mitigated VOC Emissions (99% control)

Daily Emissions (controlled) = 5.693 lbs/day

**Excess VOC Emissions (also assuming 99% control for C97) = 0 lbs/day**

21. Explain how you plan to reduce (mitigate) excess emissions during the variance period to the maximum extent feasible, or why reductions are not feasible.

World Oil is proposing to control emissions from the Storage Tanks, Wastewater Components, and Asphalt Loading Operations using alternative control devices with control efficiency equivalent to that of the permitted control device. One control system is planned for the Storage Tanks and Wastewater Components, and a second control system is planned for the Asphalt Loading Operations. Both systems are expected to be identical to the system World Oil used during its last variance when C97 could not be operated.

As such, there will be no excess emissions. Further, since the remainder of the facility will be shut down during the variance period, there are no available concurrent reductions that can be used as mitigations.

22. How do you plan to monitor or quantify emission levels from the equipment or activity(s) during the variance period, and to make such records available to the District? **Any proposed monitoring does not relieve RECLAIM facilities from applicable missing data requirements.**

VOC breathing loss emissions from the Storage Tanks would be calculated based on the duration of the shutdown. The duration of the shutdown would be monitored so breathing loss emissions can be calculated. Further, World Oil will record the quantity of asphalt loaded via the Asphalt Loading Operations, which will allow it to calculate emissions from those operations.

23. How do you intend to achieve compliance with the rule(s) and/or permit condition(s)? Include a detailed description of any equipment to be installed, modifications or process changes to be made, permit conditions to be amended, etc., dates by which the actions will be completed, and an estimate of total costs.

Compliance will be achieved once maintenance is complete, natural gas supply has been restored by SoCalGas, and incinerator C97 is back online and receiving the vent gases from the Storage Tanks, Wastewater Components, and Asphalt Loading Operations.

Given the limited duration and straightforward nature of the variance request, and given the absence of



excess emissions, World Oil proposes that this petition be heard on the consent calendar, and World Oil's counsel will reach out to District counsel to discuss this request.

World Oil proposes the following variance conditions:

- During the variance period, World Oil shall cease use of its asphalt blowing stills and crude unit operations.
- World Oil shall use a portable vapor control system or systems to control emissions from the Storage Tanks, Wastewater Components, and Asphalt Loading Operations whenever incinerator I-301 is not being used to control vent gases from these devices. World Oil shall use a portable vapor control system or systems with valid Permits to Operate issued by the South Coast AQMD. The portable vapor control system or systems shall have a minimum control efficiency of 95%.
- Petitioner shall not operate the portable vapor control systems in a manner inconsistent with the Permits to Operate for such equipment. All conditions set forth in the Permits to Operate will be followed during the variance period.
- Petitioner shall inform South Coast AQMD compliance personnel by calling 1-800-CUT-SMOG to report a *Variance Notification* seventy-two (72) hours prior to the start of the variance period.
- Petitioner shall inform the South Coast AQMD within one (1) hour of receiving any complaint(s) from the public.
- Petitioner shall notify the Clerk of the Hearing Board ([clerkofboard@aqmd.gov](mailto:clerkofboard@aqmd.gov)) in writing and by calling 1-800-CUT-SMOG to report a *Variance Notification* within two (2) hours of achieving final compliance after the natural gas line maintenance work is complete, afterburner C281 is back online, and all affected devices are back in compliance with their permits.
- Petitioner shall pay all applicable fees to the Clerk of the Hearing Board or the variance shall be invalidated pursuant to Rule 303(k), except for excess emissions fees if applicable, which shall be paid within fifteen (15) days of notification in writing that the fees are due, unless otherwise ordered by the Hearing Board.

24. State the date you are requesting the variance to begin: February 25, 2022; and the date by which you expect to achieve final compliance: March 4, 2022 (World Oil requests a weeklong variance period in case SoCalGas's maintenance activities are extended by factors outside World Oil's control).

If the regular variance is to extend beyond one year, you **must** include a **Schedule of Increments of Progress**, specifying dates or time increments for steps needed to achieve compliance. See District Rule 102 for definition of Increments of Progress (see Attachment A, Item 24, Example #3).

List Increments of Progress here:

N/A

25. List the names of any District personnel with whom facility representatives have had contact concerning this variance petition or any related Notice of Violation or Notice to Comply.

\_\_\_\_\_  
Ext. \_\_\_\_\_  
\_\_\_\_\_  
Ext. \_\_\_\_\_

If the petition was completed by someone other than the petitioner, please provide their name and title below.

Name

Company

Title



The undersigned, under penalty of perjury, states that the above petition, including attachments and the items therein set forth, is true and correct.

Executed on 12/17/2021, at South Gate, California

  
Signature

Ray Couillard  
Print Name

Title: Refinery Manager

26. **SMALL BUSINESS and TABLE III SCHEDULE A FEES:** To be eligible for reduced fees for small businesses, individuals, or entities meeting small business gross receipts criterion [see District Rule 303(h)], you must complete the following:

***Declaration Re Reduced Fee Eligibility***

1. The petitioner is
- a) ☐ an individual, or
  - b) ☐ an officer, partner or owner of the petitioner herein, or a duly authorized agent of the petitioner authorized to make the representations set forth herein.

***If you selected 1a, above, skip item 2.***

2. The petitioner is
- a) ☐ a business that meets the following definition of Small Business as set forth in District Rule 102:  
SMALL BUSINESS means a business which is independently owned and operated and meets the following criteria, or if affiliated with another concern, the combined activities of both concerns shall meet these criteria:
    - (a) the number of employees is 10 or less; **AND**
    - (b) the total gross annual receipts are \$500,000 or less or
    - (iii) the facility is a not-for-profit training center.

**-OR-**

- b) ☐ an entity with total gross annual receipts of \$500,000 or less.
3. Therefore, I believe the petitioner qualifies for reduced fees for purpose of filing fees and excess emission fee calculations, in accordance with Rule 303(h).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on \_\_\_\_\_, at \_\_\_\_\_, California

Signature

Print Name

Title \_\_\_\_\_

**ATTACHMENT A**

**ITEM 1**

Type of Variance Requested:

- (a) **SHORT:** If compliance with District rule(s) can be achieved in 90 days or less, request a short variance. (Hearing will be held approximately 21 days from date of filing--10-day posted notice required.)
- (b) **REGULAR:** If compliance with District rule(s) will take more than 90 days, request a regular variance. If the variance request will extend beyond one year, you must include a specific detailed schedule of



Portion of Section D of Facility Permit Relevant to  
Variance Petition





## FACILITY PERMIT TO OPERATE LUNDAY-THAGARD CO DBA WORLD OIL REFINING

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
<b>Process 1: CRUDE DISTILLATION</b>					
<b>System 1: CRUDE ATMOSPHERIC DISTILLATION UNIT</b>					S4.1, S13.1, S15.1, S15.2
FRACTIONATOR, C-101, CRUDE TOWER, HEIGHT: 110 FT ; DIAMETER: 9 FT A/N: 607637	D6	C97			
KNOCK OUT POT, D-110, OVERHEAD OFF GAS, HEIGHT: 8 FT 9 IN; DIAMETER: 2 FT A/N: 607637	D261				
ACCUMULATOR, D-101, NAPHTHA, LENGTH: 16 FT ; DIAMETER: 5 FT WITH VESSEL, WATER BOOT, HEIGHT: 4 FT ; DIAMETER: 2 FT 6 IN	D287	C97			
COLUMN, STRIPPER, KEROSENE, HEIGHT: 16 FT 9 IN; DIAMETER: 2 FT 8 IN A/N: 607637	D4				
FRACTIONATOR, C-102, DIESEL TOWER, HEIGHT: 28 FT 5 IN; DIAMETER: 3 FT 9 IN A/N: 607637	D5				
FRACTIONATOR, C-103, ATMOSPHERIC GAS OIL TOWER, HEIGHT: 7 FT 9 IN; DIAMETER: 3 FT 2 IN A/N: 607637	D1	D131			
FUGITIVE EMISSIONS, MISCELLANEOUS A/N: 607637	D165				H23.24
<b>System 2: CRUDE VACUUM DISTILLATION UNIT</b>					S4.1, S13.1, S15.1, S15.2

- |  |   |
|--|---|
| * (1) (1A) (1B) Denotes RECLAIM emission factor          | (2) (2A) (2B) Denotes RECLAIM emission rate                   |
| (3) Denotes RECLAIM concentration limit                  | (4) Denotes BACT emission limit                               |
| (5) (5A) (5B) Denotes command and control emission limit | (6) Denotes air toxic control rule limit                      |
| (7) Denotes NSR applicability limit                      | (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.) |
| (9) See App B for Emission Limits                        | (10) See section J for NESHAP/MACT requirements               |

\*\* Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.





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Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
<b>Process 1: CRUDE DISTILLATION</b>					
FRACTIONATOR, 1ST STAGE, TOP VACUUM, C-104, HEIGHT: 29 FT; DIAMETER: 5 FT 2 IN A/N: 563995	D7	C97			
FRACTIONATOR, 2ND STAGE, BOTTOM VACUUM, C-105, HEIGHT: 28 FT 1 IN; DIAMETER: 7 FT 6 IN A/N: 563995	D8	C97			
EJECTOR, SE-104, SE-105, FIRST STAGE, VACUUM, STEAM OPERATED A/N: 563995	D17				H23.7
EJECTOR, SE-101, SE-102, SE-103, SE-106, SE-107, SE-108, CROLL-REYNOLDS, 2ND STAGE, VACUUM, STEAM OPERATED, VACUUM JET A/N: 563995	D18				H23.7
PROCESS TANK, HOT WELL, D-105, HEIGHT: 9 FT 6 IN; DIAMETER: 3 FT 5 IN A/N: 563995	D262				
DRUM, VESSEL, D-109, HEIGHT: 6 FT 11 IN; DIAMETER: 2 FT A/N: 563995	D263				
DRUM, VESSEL, D-119, HEIGHT: 4 FT 3 IN; DIAMETER: 10 IN A/N: 563995	D264				
FUGITIVE EMISSIONS, MISCELLANEOUS A/N: 563995	D166				H23.8
<b>System 3: CRUDE HEATING SYSTEM</b>					

- \* (1) (1A) (1B) Denotes RECLAIM emission factor
- (3) Denotes RECLAIM concentration limit
- (5) (5A) (5B) Denotes command and control emission limit
- (7) Denotes NSR applicability limit
- (9) See App B for Emission Limits

- (2) (2A) (2B) Denotes RECLAIM emission rate
- (4) Denotes BACT emission limit
- (6) Denotes air toxic control rule limit
- (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
- (10) See section J for NESHAP/MACT requirements

\*\* Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.





## FACILITY PERMIT TO OPERATE LUNDAY-THAGARD CO DBA WORLD OIL REFINING

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
<b>Process 1: CRUDE DISTILLATION</b>					
HEATER, H-501, ROAD OIL, NATURAL GAS, WITH LOW NOX BURNER, 6 MMBTU/HR WITH A/N: 474534  BURNER, NATURAL GAS, ZEECO, MODEL GLSF-12, WITH LOW NOX BURNER, 1 TOTAL; 6 MMBTU/HR	D19		NOX: PROCESS UNIT**	CO: 400 PPMV (5) [RULE 1146, 11-1-2013]; CO: 2000 PPMV (5A) [RULE 407, 4-2-1982]; NOX 30 PPMV (3) [RULE 2012, 5-6-2005]; PM: (9) [RULE 404, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]	C1.27
HEATER, PETROCHEM, ATMOSPHERIC CHARGE, NATURAL GAS ONLY, WITH LOW NOX BURNER, 39 MMBTU/HR WITH A/N: 433601  BURNER, LOW NOX BURNERS, NATURAL GAS, ZEECO, MODEL GLSF-12, WITH LOW NOX BURNER, 5 TOTAL; 7.8 MMBTU/HR	D20		NOX: LARGE SOURCE**	CO: 400 PPMV (5) [RULE 1146, 11-1-2013]; CO: 2000 PPMV (5A) [RULE 407, 4-2-1982]; NOX 60 PPMV (3) [RULE 2012, 5-6-2005]; PM: (9) [RULE 404, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]	C1.28, D28.6
FUGITIVE EMISSIONS, MISCELLANEOUS A/N: 433601	D167				H23.8

- \* (1) (1A) (1B) Denotes RECLAIM emission factor  
(3) Denotes RECLAIM concentration limit  
(5) (5A) (5B) Denotes command and control emission limit  
(7) Denotes NSR applicability limit  
(9) See App B for Emission Limits

- (2) (2A) (2B) Denotes RECLAIM emission rate  
(4) Denotes BACT emission limit  
(6) Denotes air toxic control rule limit  
(8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)  
(10) See section J for NESHAP/MACT requirements

\*\* Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.





## FACILITY PERMIT TO OPERATE LUNDAY-THAGARD CO DBA WORLD OIL REFINING

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
<b>Process 1: CRUDE DISTILLATION</b>					
HEATER, JOY, VACUUM CHARGE, NATURAL GAS, WITH LOW NOX BURNER, FLUE GAS RECIRCULATION, 5.5 MMBTU/HR WITH A/N: 339698	D84	S194	NOX: PROCESS UNIT**	CO: 400 PPMV (5) [RULE 1146, 11-1-2013]; CO: 2000 PPMV (5A) [RULE 407, 4-2-1982]; NOX 0.045 LBS/MMBTU (1) [RULE 2012, 5-6-2005]; PM: (9) [RULE 404, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]	D332.1
BURNER, NATURAL GAS, COEN, MODEL SDAF-10, MICRO-NOX, WITH LOW NOX BURNER, 5.5 MMBTU/HR					
STACK A/N: 339698	S194	D84			
FUGITIVE EMISSIONS, MISCELLANEOUS A/N: 474534	D182				H23.8
<b>Process 2: TREATING/STRIPPING</b>					
<b>System 1: H2S REMOVAL/SOUR GAS TREATING SYSTEM</b>					S4.1, S18.1, S31.1
SCRUBBER, PACKED BED, V-401, SULFUR SCRUBBING MEDIA, 300,000 LBS, IN SERIES, HEIGHT: 50 FT ; DIAMETER: 12 FT A/N: 438515	C217	C220 C221			E73.1, E73.2, E193.1, E193.4
SCRUBBER, PACKED BED, V-402, SULFUR SCRUBBING MEDIA, 300,000 LBS, IN SERIES, HEIGHT: 50 FT ; DIAMETER: 12 FT A/N: 438515	C218	C220 C221			E73.1, E73.2, E193.1, E193.4

- \* (1) (1A) (1B) Denotes RECLAIM emission factor  
(3) Denotes RECLAIM concentration limit  
(5) (5A) (5B) Denotes command and control emission limit  
(7) Denotes NSR applicability limit  
(9) See App B for Emission Limits
- (2) (2A) (2B) Denotes RECLAIM emission rate  
(4) Denotes BACT emission limit  
(6) Denotes air toxic control rule limit  
(8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)  
(10) See section J for NESHAP/MACT requirements
- \*\* Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



## FACILITY PERMIT TO OPERATE LUNDAY-THAGARD CO DBA WORLD OIL REFINING

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
<b>Process 2: TREATING/STRIPPING</b>					
SCRUBBER, PACKED BED, V-403, SULFUR SCRUBBING MEDIA, 300,000 LBS, IN SERIES, HEIGHT: 50 FT ; DIAMETER: 12 FT A/N: 438515	C219	C220 C221			E73.1, E73.2, E193.1, E193.4
SCRUBBER, PACKED BED, V-410, POTASSIUM PERMANGANATE, POLISHER, 5,000 LBS, IN SERIES, HEIGHT: 10 FT ; DIAMETER: 6 FT A/N: 438515	C220	C97 C217 C218 C219			E73.1, E193.2
SCRUBBER, PACKED BED, V-411, POTASSIUM PERMANGANATE, POLISHER, 5,000 LBS, IN SERIES, HEIGHT: 10 FT ; DIAMETER: 6 FT A/N: 438515	C221	C97 C217 C218 C219			E73.1, E193.2
FUGITIVE EMISSIONS, MISCELLANEOUS A/N: 438515	D235				H23.17
<b>System 2: TANK VENT LINE H2S REMOVAL SYSTEM</b>					
SCRUBBER, PACKED BED, V-510, SULFUR SCRUBBING MEDIA, 6,000 LBS, IN SERIES, HEIGHT: 8 FT ; DIAMETER: 4 FT A/N:	C239	D35 D38 D39 D40 D47 D48 D49 D50 D71 C97 C240 D251 D252 D269 D270 D284 D286			E193.2, E193.4, E193.5
SCRUBBER, PACKED BED, V-511, SULFUR SCRUBBING MEDIA, 6,000 LBS, IN SERIES, HEIGHT: 8 FT ; DIAMETER: 4 FT A/N:	C240	D35 D38 D39 D40 D47 D48 D49 D50 D71 C97 C239 D251 D252 D269 D270 D284 D286			E193.2, E193.4, E193.5

- \* (1) (1A) (1B) Denotes RECLAIM emission factor
- (3) Denotes RECLAIM concentration limit
- (5) (5A) (5B) Denotes command and control emission limit
- (7) Denotes NSR applicability limit
- (9) See App B for Emission Limits

- (2) (2A) (2B) Denotes RECLAIM emission rate
- (4) Denotes BACT emission limit
- (6) Denotes air toxic control rule limit
- (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
- (10) See section J for NESHAP/MACT requirements

\*\* Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.





## FACILITY PERMIT TO OPERATE LUNDAY-THAGARD CO DBA WORLD OIL REFINING

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
<b>Process 2: TREATING/STRIPPING</b>					
BLOWER, BL-514 AND BL-515, ONE STAND-BY, COMMON TO C239 AND C240, 3 HP A/N:	D242				
FUGITIVE EMISSIONS, MISCELLANEOUS A/N:	D244				H23.17
<b>Process 3: LOADING AND UNLOADING</b>					
<b>System 1: ROAD OIL LOADING/UNLOADING</b>					
LOADING ARM, ASPHALT, FLEXIBLE HOSE, 4 TOTAL; DIAMETER: 4 IN A/N: 403057	D25	D271 D291			C1.25, C6.5, C6.7, H23.14
FUGITIVE EMISSIONS, MISCELLANEOUS A/N: 403057	D168				H23.8
<b>System 2: ASPHALT LOADING/UNLOADING</b>					
LOADING ARM, ASPHALT, 2 TOTAL; DIAMETER: 4 IN A/N: 403055	D29	C97			C1.11, C6.5, C6.7, H23.14
FUGITIVE EMISSIONS, MISCELLANEOUS A/N: 403055	D225				H23.8
UNLOADING ARM, ASPHALT, 4 TOTAL; DIAMETER: 4 IN A/N: 310122	D132				
FUGITIVE EMISSIONS, MISCELLANEOUS A/N: 310122	D169				H23.8
<b>System 3: EAST AREA NAPHTHA LOADING</b>					S13.3

- \* (1) (1A) (1B) Denotes RECLAIM emission factor  
(3) Denotes RECLAIM concentration limit  
(5) (5A) (5B) Denotes command and control emission limit  
(7) Denotes NSR applicability limit  
(9) See App B for Emission Limits

- (2) (2A) (2B) Denotes RECLAIM emission rate  
(4) Denotes BACT emission limit  
(6) Denotes air toxic control rule limit  
(8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)  
(10) See section J for NESHAP/MACT requirements

\*\* Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



## FACILITY PERMIT TO OPERATE LUNDAY-THAGARD CO DBA WORLD OIL REFINING

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
<b>Process 3: LOADING AND UNLOADING</b>					
LOADING ARM, TANK TRUCK / TRAILER, NAPHTHA, 2 TOTAL; DIAMETER: 3 IN A/N:	D136	C246 C247		VOC: 0.04 LBS/1000 GAL (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]; VOC: 0.08 LBS/1000 GAL (5) [RULE 462, 5-14-1999]	C1.33, H23.9, H23.22
FUGITIVE EMISSIONS, MISCELLANEOUS A/N:	D170				H23.8
<b>System 4: CRUDE OIL UNLOADING</b>					
UNLOADING ARM, CRUDE OIL, 4 TOTAL; DIAMETER: 4 IN A/N: 310124	D138				
UNLOADING ARM, CRUDE OIL, 2 TOTAL; DIAMETER: 4 IN A/N: 336738	D154				
FUGITIVE EMISSIONS, MISCELLANEOUS A/N: 336738	D171				H23.8
<b>System 5: BULK PETROLEUM LOADING</b>					
LOADING ARM, TANK TRUCK / TRAILER, BULK PETROLEUM, 6 TOTAL; DIAMETER: 4 IN A/N: 527595	D142	C246 C247			B22.6
FUGITIVE EMISSIONS, MISCELLANEOUS A/N: 527595	D172				H23.8
<b>System 6: CRUDE OIL/ASPHALT FLUX RACK NO. 6</b>					S31.2
UNLOADING ARM, TANK TRUCK, CRUDE OIL, ASPHALT FLUX, 3 TOTAL; DIAMETER: 3 IN A/N: 346489	D253				

- \* (1) (1A) (1B) Denotes RECLAIM emission factor  
(3) Denotes RECLAIM concentration limit  
(5) (5A) (5B) Denotes command and control emission limit  
(7) Denotes NSR applicability limit  
(9) See App B for Emission Limits

- (2) (2A) (2B) Denotes RECLAIM emission rate  
(4) Denotes BACT emission limit  
(6) Denotes air toxic control rule limit  
(8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)  
(10) See section J for NESHAP/MACT requirements

\*\* Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.





## FACILITY PERMIT TO OPERATE LUNDAY-THAGARD CO DBA WORLD OIL REFINING

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
<b>Process 3: LOADING AND UNLOADING</b>					
FUGITIVE EMISSIONS, MISCELLANEOUS A/N: 346489	D254				H23.13
<b>Process 4: WASTEWATER TREATING SYSTEM</b>					
<b>System 1: WASTEWATER TREATING SYSTEM</b>					S1.1, S4.2
OIL WATER SEPARATOR, FIXED ROOF, ABOVE-GROUND, PAN AMERICA ENVIRONMENTAL, 72,000 GALS PER DAY, WIDTH: 12 FT 5 IN; HEIGHT: 4 FT 6 IN; LENGTH: 3 FT 5 IN WITH A/N:  COMPARTMENT, MEDIA, COALESCING, 24 CU FT.	D222	C97 D237		VOC: 500 PPMV (5) [RULE 1176, 9-13-1996]	H23.10, H23.11, H23.12, H23.22
AIR FLOATATION UNIT, DAF CIRCULAR; DIAMETER: 12 FT 9 IN TOP SECTION; DIAMETER: 10 FT 3 IN MAIN BODY, HEIGHT 10 FT 3 IN; CLOSED TOP, AND A SKIMMING ARM A/N:	D237	C97 D222		VOC: 500 PPMV (5) [RULE 1176, 9-13-1996]	H23.10, H23.11, H23.22
FILTER, SAND, D-003, HEIGHT: 6 FT 8 IN; DIAMETER: 3 FT A/N:	D276				
FILTER, SAND, BACKWASH DRUM, D-015, HEIGHT: 8 FT 3 IN; DIAMETER: 4 FT A/N:	D277				
ACCUMULATOR, FLOC, D-013, LENGTH: 8 FT ; DIAMETER: 4 FT A/N:	D278				H23.10

- \* (1) (1A) (1B) Denotes RECLAIM emission factor  
(3) Denotes RECLAIM concentration limit  
(5) (5A) (5B) Denotes command and control emission limit  
(7) Denotes NSR applicability limit  
(9) See App B for Emission Limits

- (2) (2A) (2B) Denotes RECLAIM emission rate  
(4) Denotes BACT emission limit  
(6) Denotes air toxic control rule limit  
(8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)  
(10) See section J for NESHAP/MACT requirements

\*\* Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



## FACILITY PERMIT TO OPERATE LUNDAY-THAGARD CO DBA WORLD OIL REFINING

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
<b>Process 4: WASTEWATER TREATING SYSTEM</b>					
ACCUMULATOR, DAF WATER, D-014, HEIGHT: 4 FT 11 IN; DIAMETER: 3 FT A/N:	D279				
SETTLING TANK, OUTFALL WATER, D-005, HEIGHT: 9 FT 10 IN; DIAMETER: 12 FT 4 IN A/N:	D280				
FILTER, CARBON, V-021, HEIGHT: 9 FT 7 IN; DIAMETER: 6 FT 1 IN A/N:	D281				
FILTER, CARBON, V-022, HEIGHT: 9 FT 7 IN; DIAMETER: 6 FT 1 IN A/N:	D282				
TANK, AERATION, D-004, HEIGHT: 3 FT 7 IN; DIAMETER: 8 FT A/N:	D283				
INJECTOR, AIR A/N:	D33			VOC: 500 PPMV (5) [RULE 1176, 9-13-1996]	
DRAIN SYSTEM COMPONENT A/N:	D193			VOC: 500 PPMV (5) [RULE 1176, 9-13-1996]	H23.10, H23.11
FUGITIVE EMISSIONS, MISCELLANEOUS A/N:	D173				H23.13
<b>Process 5: STORAGE TANKS</b>					
<b>System 1: FIXED ROOF</b>					
STORAGE TANK, FIXED ROOF, 423, NAPHTHA, GAS OIL, LIGHT DISTILLATE OIL, 20305 GALS; DIAMETER: 12 FT ; HEIGHT: 24 FT A/N: 597148	D284	C239 C240		VOC: 500 PPMV (8) [40CFR 60 Subpart Kb, 10-15-2003]	B22.11, C1.20, D90.5, E336.1, H23.20, H23.22, K67.12

- \* (1) (1A) (1B) Denotes RECLAIM emission factor  
(3) Denotes RECLAIM concentration limit  
(5) (5A) (5B) Denotes command and control emission limit  
(7) Denotes NSR applicability limit  
(9) See App B for Emission Limits

- (2) (2A) (2B) Denotes RECLAIM emission rate  
(4) Denotes BACT emission limit  
(6) Denotes air toxic control rule limit  
(8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)  
(10) See section J for NESHAP/MACT requirements

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## FACILITY PERMIT TO OPERATE LUNDAY-THAGARD CO DBA WORLD OIL REFINING

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
<b>Process 5: STORAGE TANKS</b>					
STORAGE TANK, FIXED ROOF, NO. 8705, GAS OIL, CRUDE OIL, WITH A MIXER, 8700 BBL; DIAMETER: 36 FT ; HEIGHT: 48 FT A/N: 498827	D35	C239 C240			C1.32, H23.13, H23.19, H23.22, K67.6
STORAGE TANK, FIXED ROOF, STEAM HEATED, NO. 412, ASPHALT FLUX, 20000 GALS; DIAMETER: 12 FT ; HEIGHT: 24 FT A/N: 564022	D37				B22.3, B22.8, H23.19, K67.2
STORAGE TANK, FIXED ROOF, NO. 413, 20000 GALS; DIAMETER: 12 FT ; HEIGHT: 24 FT A/N: 556994	D38	C239 C240			B22.3, H23.19, K67.2
STORAGE TANK, FIXED ROOF, NO. 414, WITH A MIXER, 20000 GALS; DIAMETER: 12 FT ; HEIGHT: 24 FT A/N: 564027	D39	C239 C240			B22.3, H23.19, K67.2
STORAGE TANK, FIXED ROOF, NO. 415, PRV SET @ 0.375 PSIG, 20000 GALS; DIAMETER: 12 FT ; HEIGHT: 24 FT A/N: 620866	D40	C239 C240			B22.3, H23.19, H23.22, K67.2
STORAGE TANK, FIXED ROOF, STEAM HEATED, NO. 416, ASPHALT FLUX, PRV SET @ 0.375 PSIG, 20000 GALS; DIAMETER: 12 FT ; HEIGHT: 24 FT A/N: 620867	D41				B22.3, B22.8, H23.19, K67.2
STORAGE TANK, FIXED ROOF, STEAM HEATED, NO. 417, ASPHALT FLUX, PRV SET @ 0.375 PSIG, 20000 GALS; DIAMETER: 12 FT ; HEIGHT: 24 FT A/N: 620868	D42				B22.3, B22.8, H23.19, K67.2

- \* (1) (1A) (1B) Denotes RECLAIM emission factor  
(3) Denotes RECLAIM concentration limit  
(5) (5A) (5B) Denotes command and control emission limit  
(7) Denotes NSR applicability limit  
(9) See App B for Emission Limits
- (2) (2A) (2B) Denotes RECLAIM emission rate  
(4) Denotes BACT emission limit  
(6) Denotes air toxic control rule limit  
(8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)  
(10) See section J for NESHAP/MACT requirements

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## FACILITY PERMIT TO OPERATE LUNDAY-THAGARD CO DBA WORLD OIL REFINING

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
<b>Process 5: STORAGE TANKS</b>					
STORAGE TANK, FIXED ROOF, 419, NAPHTHA, GAS OIL, 20160 GALS; DIAMETER: 12 FT ; HEIGHT: 24 FT A/N: 493999	D47	C239 C240			C1.20, H23.13, H23.19, H23.22, K67.6
STORAGE TANK, FIXED ROOF, 420, NAPHTHA, GAS OIL, PRV SET @ 0.375 PSIG, 20160 GALS; DIAMETER: 12 FT ; HEIGHT: 24 FT A/N: 620869	D48	C239 C240			C1.19, H23.13, H23.19, K67.6
STORAGE TANK, FIXED ROOF, 421, NAPHTHA, GAS OIL, PRV SET @ 0.375 PSIG, 20160 GALS; DIAMETER: 12 FT ; HEIGHT: 24 FT A/N: 620870	D49	C239 C240			C1.31, H23.13, H23.19, H23.22, K67.6
STORAGE TANK, FIXED ROOF, 422, NAPHTHA, GAS OIL, KEROSENE, PRV SET @ 0.375 PSIG, 20160 GALS; DIAMETER: 12 FT ; HEIGHT: 24 FT A/N: 620871	D50	C239 C240			C1.20, H23.13, H23.19, H23.22, K67.6
STORAGE TANK, FIXED ROOF, STEAM HEATED, NO. 2029, ASPHALT, WITH A MIXER, 2000 BBL; DIAMETER: 19 FT ; HEIGHT: 40 FT A/N: 578906	D58	C59			A63.1, B59.3, C1.41, C6.14, H23.1, K67.11
CONDENSER, PACKED, 55-GAL DRUM, WITH STEEL WOOL A/N: 578906	C59	D58			C6.10, D12.5, D322.1, E202.1, K67.10
STORAGE TANK, FIXED ROOF, 2030, ASPHALT, 2000 BBL; DIAMETER: 19 FT ; HEIGHT: 40 FT A/N: 380744	D60	C61			A63.1, C1.8, H23.1

- \* (1) (1A) (1B) Denotes RECLAIM emission factor  
(3) Denotes RECLAIM concentration limit  
(5) (5A) (5B) Denotes command and control emission limit  
(7) Denotes NSR applicability limit  
(9) See App B for Emission Limits

- (2) (2A) (2B) Denotes RECLAIM emission rate  
(4) Denotes BACT emission limit  
(6) Denotes air toxic control rule limit  
(8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)  
(10) See section J for NESHAP/MACT requirements

\*\* Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.





## FACILITY PERMIT TO OPERATE LUNDAY-THAGARD CO DBA WORLD OIL REFINING

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
<b>Process 5: STORAGE TANKS</b>					
CONDENSER, PACKED, 55-GAL DRUM, WITH STEEL WOOL A/N: 380744	C61	D60			D12.5, D322.1
STORAGE TANK, FIXED ROOF, 10027, ASPHALT, WITH A MIXER AND INTERNAL STEAM COILS, 10000 BBL; DIAMETER: 42 FT 6 IN; HEIGHT: 40 FT 10 IN A/N: 589462	D62	C63			A63.1, B22.1, B59.3, C1.43, C6.17, H23.1, K67.2
CONDENSER, WATER SEAL, PACKED, 55-GAL DRUM, WITH STEEL WOOL A/N: 589462	C63	D62			C6.10, D12.5, D322.1
STORAGE TANK, FIXED ROOF, STEAM HEATED, NO. 2025, ASPHALT, WITH MIXER, 2000 BBL; DIAMETER: 19 FT ; HEIGHT: 40 FT A/N: 613090	D64	C65			A63.1, B22.1, B59.5, C1.41, C6.14, H23.25, K67.13
CONDENSER, PACKED, 55-GAL DRUM, WITH STEEL WOOL A/N: 613090	C65	D64			C6.10, D12.5, D322.1, E202.1, K67.10
STORAGE TANK, FIXED ROOF, 10028, ASPHALT, WITH A MIXER AND INTERNAL STEAM COILS, 10000 BBL; DIAMETER: 42 FT 6 IN; HEIGHT: 40 FT A/N: 589463	D66	C67			A63.1, B22.1, B59.3, C1.43, C6.17, H23.1, K67.2
CONDENSER, WATER SEAL, PACKED, 55-GAL DRUM, WITH STEEL WOOL A/N: 589463	C67	D66			C6.10, D12.5, D322.1

- \* (1) (1A) (1B) Denotes RECLAIM emission factor  
(3) Denotes RECLAIM concentration limit  
(5) (5A) (5B) Denotes command and control emission limit  
(7) Denotes NSR applicability limit  
(9) See App B for Emission Limits

- (2) (2A) (2B) Denotes RECLAIM emission rate  
(4) Denotes BACT emission limit  
(6) Denotes air toxic control rule limit  
(8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)  
(10) See section J for NESHAP/MACT requirements

\*\* Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



## FACILITY PERMIT TO OPERATE LUNDAY-THAGARD CO DBA WORLD OIL REFINING

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
<b>Process 5: STORAGE TANKS</b>					
STORAGE TANK, FIXED ROOF, STEAM HEATED, NO. 6606, DISTILLATE, ASPHALT, WITH INTERNAL STEAM COILS, WITH MIXER, 6600 BBL; DIAMETER: 32 FT ; HEIGHT: 48 FT A/N: 617116	D70	C203			C6.8, H23.2, K67.2
CONDENSER, PACKED, 55-GAL DRUM, WITH STEEL WOOL A/N: 617116	C203	D70			D12.5, D322.1
STORAGE TANK, FIXED ROOF, STEAM HEATED, NO. 4208, WITH INTERNAL STEAM COILS, 4200 BBL; DIAMETER: 25 FT ; HEIGHT: 48 FT A/N: 556995	D71	C239 C240			C6.9, H23.19, K67.2
STORAGE TANK, FIXED ROOF, STEAM HEATED, NO. 4207, WITH A MIXER AND INTERNAL STEAM COILS, 4200 BBL; DIAMETER: 25 FT ; HEIGHT: 48 FT A/N: 380753	D73	C206			C6.8, H23.2, K67.2
CONDENSER, PACKED, 55-GAL DRUM, WITH STEEL WOOL A/N: 380753	C206	D73			D12.5, D322.1
STORAGE TANK, FIXED ROOF, STEAM HEATED, NO. 4210, WITH A MIXER AND INTERNAL STEAM COILS, 4200 BBL; DIAMETER: 25 FT ; HEIGHT: 48 FT A/N: 380755	D75	C207			C6.8, H23.2, K67.2
CONDENSER, PACKED, 55-GAL DRUM, WITH STEEL WOOL A/N: 380755	C207	D75			D12.5, D322.1

- \* (1) (1A) (1B) Denotes RECLAIM emission factor  
(3) Denotes RECLAIM concentration limit  
(5) (5A) (5B) Denotes command and control emission limit  
(7) Denotes NSR applicability limit  
(9) See App B for Emission Limits

- (2) (2A) (2B) Denotes RECLAIM emission rate  
(4) Denotes BACT emission limit  
(6) Denotes air toxic control rule limit  
(8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)  
(10) See section J for NESHAP/MACT requirements

\*\* Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.





## FACILITY PERMIT TO OPERATE LUNDAY-THAGARD CO DBA WORLD OIL REFINING

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
<b>Process 5: STORAGE TANKS</b>					
STORAGE TANK, FIXED ROOF, STEAM HEATED, 4211, WITH A MIXER AND INTERNAL STEAM COILS, 4200 BBL; DIAMETER: 25 FT ; HEIGHT: 48 FT A/N: 380756	D76	C208			C6.8, H23.2, K67.2
CONDENSER, PACKED, 55-GAL DRUM, WITH STEEL WOOL A/N: 380756	C208	D76			D12.5, D322.1
STORAGE TANK, FIXED ROOF, STEAM HEATED, NO. 2036, ASPHALT, 2000 BBL; DIAMETER: 19 FT ; HEIGHT: 40 FT A/N: 578905	D123	C124			A63.1, B22.1, B59.4, C1.42, C6.15, H23.1, K67.11
CONDENSER, PACKED, 55-GAL DRUM, WITH STEEL WOOL A/N: 578905	C124	D123			C6.10, D12.5, D322.1, E202.1, K67.10
STORAGE TANK, FIXED ROOF, STEAM HEATED, NO. 1231, WITH A MIXER, ASPHALT, 1200 BBL; DIAMETER: 15 FT ; HEIGHT: 40 FT A/N: 575578	D125	C126			A63.1, C1.34, C6.2, E71.1, H23.1
CONDENSER, WATER SEAL, PACKED, 55-GAL DRUM, WITH STEEL WOOL A/N: 575578	C126	D125			D12.2, D12.5, D322.1
STORAGE TANK, FIXED ROOF, STEAM HEATED, NO. 1232, ASPHALT, CUT-BACK ASPHALT, WITH MIXER, 1200 BBL; DIAMETER: 15 FT ; HEIGHT: 40 FT A/N: 556990	D127	C128			A63.1, B22.12, C1.4, E71.1, H23.1

- \* (1) (1A) (1B) Denotes RECLAIM emission factor  
(3) Denotes RECLAIM concentration limit  
(5) (5A) (5B) Denotes command and control emission limit  
(7) Denotes NSR applicability limit  
(9) See App B for Emission Limits

- (2) (2A) (2B) Denotes RECLAIM emission rate  
(4) Denotes BACT emission limit  
(6) Denotes air toxic control rule limit  
(8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)  
(10) See section J for NESHAP/MACT requirements

\*\* Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



## FACILITY PERMIT TO OPERATE LUNDAY-THAGARD CO DBA WORLD OIL REFINING

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
<b>Process 5: STORAGE TANKS</b>					
CONDENSER, PACKED, 55-GAL DRUM, WITH STEEL WOOL A/N: 556990	C128	D127			C6.10, D12.2, D12.5, D322.1
STORAGE TANK, FIXED ROOF, STEAM HEATED, NO. 1233, WITH A MIXER, ASPHALT, 1200 BBL; DIAMETER: 15 FT ; HEIGHT: 40 FT A/N: 575579	D129	C130			A63.1, C1.35, C6.8, E71.1, H23.1
CONDENSER, WATER SEAL, PACKED, 55-GAL DRUM, WITH STEEL WOOL A/N: 575579	C130	D129			D12.2, D12.5, D322.1
STORAGE TANK, FIXED ROOF, STEAM HEATED, NO. 2026, ASPHALT, WITH MIXER, 2000 BBL; DIAMETER: 19 FT ; HEIGHT: 40 FT A/N: 578904	D152	C153			A63.1, B59.3, C1.41, C6.13, H23.1, K67.11
CONDENSER, PACKED, 55-GAL DRUM, WITH STEEL WOOL A/N: 578904	C153	D152			C6.10, D12.5, D322.1, E202.1, K67.10
STORAGE TANK, FIXED ROOF, NO. 1234, ASPHALT, WITH MIXER, 1200 BBL; DIAMETER: 15 FT ; HEIGHT: 40 FT A/N: 612432	D163	C164			C1.12, C6.2, E71.1, H23.1
CONDENSER, PACKED, 55-GAL DRUM, WITH STEEL WOOL A/N: 612432	C164	D163			D12.5, D322.1
STORAGE TANK, FIXED ROOF, NO. 10001, CRUDE OIL, WITH A MIXER, 10307 BBL; DIAMETER: 41 FT ; HEIGHT: 43 FT 10 IN A/N: 540826	D251	C239 C240			B22.4, C1.21, H23.13, H23.20, H23.22, K67.6

- \* (1) (1A) (1B) Denotes RECLAIM emission factor  
(3) Denotes RECLAIM concentration limit  
(5) (5A) (5B) Denotes command and control emission limit  
(7) Denotes NSR applicability limit  
(9) See App B for Emission Limits

- (2) (2A) (2B) Denotes RECLAIM emission rate  
(4) Denotes BACT emission limit  
(6) Denotes air toxic control rule limit  
(8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)  
(10) See section J for NESHAP/MACT requirements

\*\* Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.





## FACILITY PERMIT TO OPERATE LUNDAY-THAGARD CO DBA WORLD OIL REFINING

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
<b>Process 5: STORAGE TANKS</b>					
STORAGE TANK, FIXED ROOF, NO. 3503, SLOP OIL, WASTE WATER, 3700 BBL; DIAMETER: 30 FT; HEIGHT: 29 FT 5 IN A/N: 539681	D252	C239 C240			B22.5, C1.31, H23.13, H23.20, H23.22, K67.6
STORAGE TANK, FIXED ROOF, LAB SLOP OIL, 500 GALS; DIAMETER: 3 FT 10 IN; LENGTH: 6 FT 3 IN A/N: 564003	D266				B22.7, C1.37, D90.4, H23.13, H23.23, K67.7
STORAGE TANK, FIXED ROOF, STEAM HEATED, NO. 2709, WITH INTERNAL STEAM COILS, 2956 BBL; DIAMETER: 21 FT; HEIGHT: 47 FT 11 IN A/N: 586970	D267	C268			A63.1, B59.2, C1.38, C6.11, H23.1, K67.2
CONDENSER, PACKED, 55-GAL DRUM, WITH STEEL WOOL A/N: 586970	C268	D267			C6.10, D12.5, D322.1
STORAGE TANK, FIXED ROOF, NO. 10002, CRUDE OIL, LIGHT DISTILLATE OIL, GAS OIL, NAPHTHA, WITH A MIXER, 10307 BBL; DIAMETER: 41 FT; HEIGHT: 43 FT 10 IN A/N: 585587	D269	C239 C240			B22.9, C1.39, D12.6, H23.13, H23.20, H23.22, K67.8
STORAGE TANK, FIXED ROOF, NO. 3504, SLOP OIL, WASTE WATER, 4029 BBL; DIAMETER: 30 FT; HEIGHT: 32 FT A/N: 588765	D270	C239 C240			B22.10, C1.31, H23.13, H23.20, H23.22, K67.6

- \* (1) (1A) (1B) Denotes RECLAIM emission factor  
(3) Denotes RECLAIM concentration limit  
(5) (5A) (5B) Denotes command and control emission limit  
(7) Denotes NSR applicability limit  
(9) See App B for Emission Limits

- (2) (2A) (2B) Denotes RECLAIM emission rate  
(4) Denotes BACT emission limit  
(6) Denotes air toxic control rule limit  
(8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)  
(10) See section J for NESHAP/MACT requirements

\*\* Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



## FACILITY PERMIT TO OPERATE LUNDAY-THAGARD CO DBA WORLD OIL REFINING

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
<b>Process 5: STORAGE TANKS</b>					
STORAGE TANK, FIXED ROOF, 418, NAPHTHA, GAS OIL, LIGHT DISTILLATE OIL, 20305 GALS; DIAMETER: 12 FT ; HEIGHT: 24 FT A/N: 603730	D286	C239 C240		VOC: 500 PPMV (8) [40CFR 60 Subpart Kb, 10-15-2003]	B22.13, C1.20, D90.5, E336.1, H23.13, H23.20, H23.22, K67.12
FUGITIVE EMISSIONS, MISCELLANEOUS A/N: 620871	D174				H23.8
STORAGE TANK, HORIZONTAL, NO.4611, 716 GALS; DIAMETER: 4 FT ; LENGTH: 8 FT A/N: 617117	D289				B59.6, B163.1, K67.14
STORAGE TANK, HORIZONTAL, NO.4612, 716 GALS; DIAMETER: 4 FT ; LENGTH: 8 FT A/N: 617118	D290				B59.6, K67.14
<b>Process 6: STEAM GENERATION</b>					
<b>System 1: BOILERS</b>					

- \* (1) (1A) (1B) Denotes RECLAIM emission factor  
(3) Denotes RECLAIM concentration limit  
(5) (5A) (5B) Denotes command and control emission limit  
(7) Denotes NSR applicability limit  
(9) See App B for Emission Limits
- (2) (2A) (2B) Denotes RECLAIM emission rate  
(4) Denotes BACT emission limit  
(6) Denotes air toxic control rule limit  
(8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)  
(10) See section J for NESHAP/MACT requirements
- \*\* Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



Portion of Section H of Facility Permit Relevant to  
Variance Petition



## FACILITY PERMIT TO OPERATE LUNDAY-THAGARD CO DBA WORLD OIL REFINING

### SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
<b>Process 2: TREATING/STRIPPING</b>					
<b>System 2: TANK VENT LINE H2S REMOVAL SYSTEM</b>					
SCRUBBER, PACKED BED, V-510, SULFUR SCRUBBING MEDIA, 6,000 LBS, HEIGHT: 8 FT ; DIAMETER: 4 FT A/N: 622796 Permit to Construct Issued: 01/27/21	C239	D35 D38 D39 D40 D45 D47 D48 D49 D50 D71 C97 D222 D237 D251 D252 D269 D270 D284 D286			E193.2, E193.4, E193.5
SCRUBBER, PACKED BED, V-511, SULFUR SCRUBBING MEDIA, 6,000 LBS, HEIGHT: 8 FT ; DIAMETER: 4 FT A/N: 622796 Permit to Construct Issued: 01/27/21	C240	D35 D38 D39 D40 D45 D47 D48 D49 D50 D71 C97 D222 D237 D251 D252 D269 D270 D284 D286			E193.2, E193.4, E193.5
BLOWER, BL-514 AND BL-515, ONE STAND-BY, COMMON TO C239 AND C240, 3 HP A/N: 622796 Permit to Construct Issued: 01/27/21	D242				
FUGITIVE EMISSIONS, MISCELLANEOUS A/N: 622796 Permit to Construct Issued: 01/27/21	D244				H23.17
<b>Process 3: LOADING AND UNLOADING</b>					
<b>System 3: EAST AREA NAPHTHA LOADING</b>					S13.3

- \* (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate  
(3) Denotes RECLAIM concentration limit (4) Denotes BACT emission limit  
(5) (5A) (5B) Denotes command and control emission limit (6) Denotes air toxic control rule limit  
(7) Denotes NSR applicability limit (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)  
(9) See App B for Emission Limits (10) See section J for NESHAP/MACT requirements
- \*\* Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.





## FACILITY PERMIT TO OPERATE LUNDAY-THAGARD CO DBA WORLD OIL REFINING

### SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
<b>Process 3: LOADING AND UNLOADING</b>					
LOADING ARM, TANK TRUCK / TRAILER, NAPHTHA, 1 TOTAL; DIAMETER: 3 IN A/N: 614728 Permit to Construct Issued: 07/16/20	D136	C246 C247		VOC: 0.04 LBS/1000 GAL (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]; VOC: 0.08 LBS/1000 GAL (5) [RULE 462 5-14-1999]	C1.33, H23.9, H23.22
FUGITIVE EMISSIONS, MISCELLANEOUS A/N: 614728 Permit to Construct Issued: 07/16/20	D170				H23.8
<b>Process 4: WASTEWATER TREATING SYSTEM</b>					
<b>System 1: WASTEWATER TREATING SYSTEM</b>					S1.1, S4.2
OIL WATER SEPARATOR, FIXED ROOF, ABOVE-GROUND, PAN AMERICA ENVIRONMENTAL, 72,000 GALS PER DAY, WIDTH: 12 FT 5 IN; HEIGHT: 4 FT 6 IN; LENGTH: 3 FT 5 IN WITH A/N: 622795 Permit to Construct Issued: 01/27/21  COMPARTMENT, MEDIA, COALESCING, 24 CU FT.	D222	C239 C240		VOC: 500 PPMV (5) [RULE 1176, 9-13-1996]	H23.10, H23.11, H23.12, H23.22
AIR FLOATATION UNIT, DAF CIRCULAR; DIAMETER: 12 FT 9 IN TOP SECTION; DIAMETER: 10 FT 3 IN MAIN BODY, HEIGHT 10 FT 3 IN; CLOSED TOP, AND A SKIMMING ARM A/N: 622795 Permit to Construct Issued: 01/27/21	D237	C239 C240		VOC: 500 PPMV (5) [RULE 1176, 9-13-1996]	H23.10, H23.11, H23.22

- \* (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate  
(3) Denotes RECLAIM concentration limit (4) Denotes BACT emission limit  
(5) (5A) (5B) Denotes command and control emission limit (6) Denotes air toxic control rule limit  
(7) Denotes NSR applicability limit (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)  
(9) See App B for Emission Limits (10) See section J for NESHAP/MACT requirements

\*\* Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



## FACILITY PERMIT TO OPERATE LUNDAY-THAGARD CO DBA WORLD OIL REFINING

### SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
<b>Process 4: WASTEWATER TREATING SYSTEM</b>					
FILTER, SAND, D-003, HEIGHT: 6 FT 8 IN; DIAMETER: 3 FT A/N: 622795 Permit to Construct Issued: 01/27/21	D276				
FILTER, SAND, BACKWASH DRUM, D-015, HEIGHT: 8 FT 3 IN; DIAMETER: 4 FT A/N: 622795 Permit to Construct Issued: 01/27/21	D277				
ACCUMULATOR, FLOC, D-013, LENGTH: 8 FT ; DIAMETER: 4 FT A/N: 622795 Permit to Construct Issued: 01/27/21	D278				H23.10
ACCUMULATOR, DAF WATER, D-014, HEIGHT: 4 FT 11 IN; DIAMETER: 3 FT A/N: 622795 Permit to Construct Issued: 01/27/21	D279				
SETTLING TANK, OUTFALL WATER, D-005, HEIGHT: 9 FT 10 IN; DIAMETER: 12 FT 4 IN A/N: 622795 Permit to Construct Issued: 01/27/21	D280				
FILTER, CARBON, V-021, HEIGHT: 9 FT 7 IN; DIAMETER: 6 FT 1 IN A/N: 622795 Permit to Construct Issued: 01/27/21	D281				
FILTER, CARBON, V-022, HEIGHT: 9 FT 7 IN; DIAMETER: 6 FT 1 IN A/N: 622795 Permit to Construct Issued: 01/27/21	D282				

\* (1) (1A) (1B) Denotes RECLAIM emission factor

(3) Denotes RECLAIM concentration limit

(5) (5A) (5B) Denotes command and control emission limit

(7) Denotes NSR applicability limit

(9) See App B for Emission Limits

(2) (2A) (2B) Denotes RECLAIM emission rate

(4) Denotes BACT emission limit

(6) Denotes air toxic control rule limit

(8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)

(10) See section J for NESHAP/MACT requirements

\*\* Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.





## FACILITY PERMIT TO OPERATE LUNDAY-THAGARD CO DBA WORLD OIL REFINING

### SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
<b>Process 4: WASTEWATER TREATING SYSTEM</b>					
TANK, AERATION, D-004, HEIGHT: 3 FT 7 IN; DIAMETER: 8 FT A/N: 622795 Permit to Construct Issued: 01/27/21	D283				
INJECTOR, AIR A/N: 622795 Permit to Construct Issued: 01/27/21	D33			VOC: 500 PPMV (5) [RULE 1176, 9-13-1996]	
DRAIN SYSTEM COMPONENT A/N: 622795 Permit to Construct Issued: 01/27/21	D193			VOC: 500 PPMV (5) [RULE 1176, 9-13-1996]	H23.10, H23.11
FUGITIVE EMISSIONS, MISCELLANEOUS A/N: 622795 Permit to Construct Issued: 01/27/21	D173				H23.13
<b>Process 5: STORAGE TANKS</b>					
<b>System 1: FIXED ROOF</b>					
STORAGE TANK, FIXED ROOF, 423, NAPHTHA, GAS OIL, LIGHT DISTILLATE OIL, 20305 GALS; DIAMETER: 12 FT ; HEIGHT: 24 FT A/N:	D284	C239 C240		VOC: 500 PPMV (8) [40CFR 60 Subpart Kb, 10-15-2003]	B22.11, C1.20, D90.5, E336.1, H23.20, H23.22, K67.12, K171.1
STORAGE TANK, FIXED ROOF, 418, NAPHTHA, GAS OIL, LIGHT DISTILLATE OIL, 20305 GALS; DIAMETER: 12 FT ; HEIGHT: 24 FT A/N: 603730 Permit to Construct Issued: 08/13/19	D286	C239 C240		VOC: 500 PPMV (8) [40CFR 60 Subpart Kb, 10-15-2003]	B22.13, C1.20, D90.5, E336.1, H23.13, H23.20, H23.22, K67.12, K171.1, L341.1
FUGITIVE EMISSIONS, MISCELLANEOUS A/N:	D174				H23.8

- \* (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate  
(3) Denotes RECLAIM concentration limit (4) Denotes BACT emission limit  
(5) (5A) (5B) Denotes command and control emission limit (6) Denotes air toxic control rule limit  
(7) Denotes NSR applicability limit (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)  
(9) See App B for Emission Limits (10) See section J for NESHAP/MACT requirements

\*\* Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

## Notices of Violation





South Coast Air Quality Management District  
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

P 65098

# NOTICE OF VIOLATION

DATE OF VIOLATION		
Month	Day	Year
06	01	2020
06	30	2020

Facility Name:	Lundgren - Thagard Co DBA World Oil Refining		Facility ID#:	800080	Sector:	WL
Location Address:	9301 Garfield Ave	City:	South Gate	Zip:	90280	
Mailing Address:	9302 Garfield Ave	City:	South Gate	Zip:	90280	

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

EACH DAY A VIOLATION OCCURS MAY BE HANDLED AS A SEPARATE OFFENSE REGARDLESS OF WHETHER OR NOT ADDITIONAL NOTICES OF VIOLATION ARE ISSUED.

## DESCRIPTION OF VIOLATIONS

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	3002(c)(1)		C1.17	Failure to keep data for refinery gas to the incinerator C97.
2	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			C6.10	Failure to keep multiple drum condensers below 120 degrees Fahrenheit.
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			D12.2	Failure to record differential pressure gauge once per month.
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			D12.5	Failure to maintain the water level in the drum condensers above 20 inches of water column.
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			C1.19	Failure to conduct quarterly ATLG calibrations.

Served To:	David Chetkowski	Phone:	(323) 350-3846	Served By:	Hay Dang	Date Notice Served:	6/4/21
Title:	Environmental Manager	Email:	dchetkowski@world	Phone No.:	<input type="checkbox"/> 909-396-7016 <input type="checkbox"/> 310-233-7016	Email:	hdang@aqmd.gov

\*Key to Authority Abbreviations:

SCAQMD - South Coast Air Quality Management District  
CCR - California Code of Regulations

CH&SC - California Health and Safety Code  
CFR - Code of Federal Regulations

Method of Service:

☒ In Person

☐ Certified Mail

VIOLATOR'S COPY



South Coast Air Quality Management District

**NOTICE OF VIOLATION**

Notice of Violation No.:

**P65098**

Issue Date:

**06/04/2021**

Date of Violation:

**01/01/20 – 06/30/20**

Additional page 1 of 2

Facility Name:

Lunday-Thagard Co DBA World Oil Refining

Facility ID:

800080

**DESCRIPTION OF VIOLATIONS**

#	Authority	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
6	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	3002(c)(1) (continued)		C1.20	Failure to conduct quarterly ATLG calibrations for device D47, D48, and D284.
7	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			C1.31	Failure to conduct quarterly ATLG calibrations for device D49, D252, and D270.
8	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			C1.41	Failure to conduct quarterly ATLG calibrations for device D152.
9	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			C1.42	Failure to conduct quarterly ATLG calibrations for device D123.
10	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			C1.35	Failure to conduct quarterly Radar Gauge or other methods (ATLG) calibrations for device D129.





South Coast  
AQMD

South Coast Air Quality Management District

# NOTICE OF VIOLATION

Notice of Violation No.:

**P65098**

Issue Date:

**06/04/2021**

Date of Violation:

**01/01/20 – 06/30/20**

Additional page 2 of 2

Facility Name:

Lunday-Tagard Co DBA World Oil Refining

Facility ID:

800080

## DESCRIPTION OF VIOLATIONS

#	Authority	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
11	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	3002(c)(1) (continued)		C1.38	Failure to conduct quarterly Radar Gauge or other methods (ATLG) calibrations for device D267.
	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				



South Coast Air Quality Management District  
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

P 74062

# NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
07	01	2020
to 12	31	2020

Facility Name: <i>Lunday-Thagard CO DBA World Oil Refining</i>		Facility ID#: <i>800080</i>	Sector: <i>WL</i>
Location Address: <i>9301 Garfield Ave</i>		City: <i>South Gate</i>	Zip: <i>90280</i>
Mailing Address: <i>9302 Garfield Ave</i>		City: <i>South Gate</i>	Zip: <i>90280</i>

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## DESCRIPTION OF VIOLATIONS

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	3002(XI)	Title V	C1.17	Failure to provide flow data for refinery gas to the incinerator (Device ID C97) due to material build-up on orifice plate of flow meter.
2	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	3002(XI)	Title V	C1.28	Failure to limit the Petrochem Heater's maximum fuel usage to no more than 27.634 MM cubic feet per month of August and October for calendar year 2020.
3	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	3002(XI)	Title V	C6.10	Failure to operate Tanks 2025 and 10028 in such a manner that temperature being monitored does not exceed 120 degrees Fahrenheit.
4	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	1173(I)(1)(C)	Title V		Failure to inspect 561 inaccessible components during 4th Quarter 2020 Rule 1173 Reporting period and inspecting components after end of 4th Quarter 2020.
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				

Served To: <i>Lyndon Hwa</i>	Phone: <i>(562) 928-7000</i> <i>ext. 2367</i>	Served By: <i>Mario Escobedo</i>	Date Notice Served: <i>05/26/2021</i>
Title: <i>Environmental Engineer</i>	Email: <i>lhw@worldoilcorp.com</i>	Phone No: <input checked="" type="checkbox"/> 909-396-2717 <input type="checkbox"/> 310-233-	Email: <i>mesobedo @ aqmd.gov</i>

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